SK Snavely King Majoros O'Connor & Lee, Inc.

Economic and Management Consultants

August 30, 2006

By Hand Delivery

Honorable Vernon A. Williams Secretary Surface Transportation Board 1925 K Street NW Room 700 Washington DC 20423



217402

RE: Ex Parte No. 646 (Sub-No. 1), Simplified Standards for Rail Rate Cases

Dear Secretary Williams,

Snavely King Majoros O'Connor & Lee, Inc. ("Snavely King") hereby files its notice of intent to participate as a party of record and provide comments in the above-captioned proceeding. Please add Snavely King to the service list.

Snavely King requests that copies of notices, decisions, comments and pleadings in this proceeding be served on the undersigned.

Kim Hillenbrand Snavely King Majoros O'Connor & Lee, Inc. 1111 14th Street NW Suite 300 Washington DC 20005

If there are questions please contact me or Tom O'Connor (202.371.9149).

Respectfully submitted,

Kim Hillenbrand Tom O'Connor

ENTERED Office of Proceedings

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Part of Public Record